

FILED
11/25/2020 4:50 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL

2020L012661

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

SYLVIA GONZALEZ,)	
)	
Plaintiff,)	
)	
vs.)	No.
)	
DOLLAR TREE STORES, INC. d/b/a)	
DOLLAR TREE,)	
)	
Defendant.)	

COMPLAINT

NOW COMES the Plaintiff, SYLVIA GONZALEZ, by and through her attorneys, CARY J. WINTROUB & ASSOCIATES, and complaining of the Defendant, DOLLAR TREE STORES, INC., states as follows:

1. That on or about December 3, 2018, and for some time prior and subsequent thereto, the Defendant, DOLLAR TREE STORES, INC., was a foreign corporation, registered to do business in the State of Illinois.

2. That on or about December 3, 2018, and for some time prior and subsequent thereto, the Defendant, DOLLAR TREE STORES, INC. owned, operated, managed, maintained and controlled the premises, d/b/a DOLLAR TREE, located at 4840 West 211th Street, in the City of Matteson, County of Cook and State of Illinois.

3. That it then and there because and was the duty of the Defendant, DOLLAR TREE STORES, INC., individually, and by and through its agents, servants and employees, to exercise reasonable and ordinary care and caution in the about the ownership, operation, management, maintenance and control of said premises so that same would be in a good, safe and proper condition for persons legally and lawfully in and upon said premises.

Exhibit A

4. That on or about December 3, 2018, the Plaintiff, SYLVIA GONZALEZ, was a customer, patron and business invitee of the Defendant, DOLLAR TREE STORES, INC. and was legally and lawfully in and upon the aforesaid premises.

5. That at the time and place aforesaid, as the Plaintiff, SYLVIA GONZALEZ, was shopping in Defendant's store, when a shelf fell on top of her.

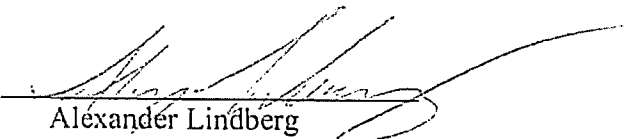
6. That at the time and place aforesaid, the Defendant, DOLLAR TREE STORES, INC, individually and by and through its agents, servants and employees, carelessly and negligently acted or failed to act in one or more of the following ways:

- (a) Improperly operated, managed, maintained and controlled said premises so that as a direct result thereof the Plaintiff was injured;
- (b) Failed to provide a good, same and proper place for the Plaintiff to be, use and occupy while on their premises;
- (c) Failed to safely stock merchandise on shelving that was accessible to the customers;
- (d) Failed to safely stock/display merchandise for purchase;
- (e) Failed to maintain shelving units upon their premises to be certain same was in a good, safe and proper condition;
- (f) Failed to inspect said premises to be certain same was in a good, safe and proper condition; and/or
- (g) Failed to warn the Plaintiff of said condition.

7. That as a direct and proximate result of one or more of the aforesaid careless and/or negligent acts of the Defendant, DOLLAR TREE STORES, INC., individually and by and through its agents, servants and employees, the Plaintiff, SYLVIA GONZALEZ, suffered and will, in the future, suffer injuries of a personal, permanent and pecuniary nature.

WHEREFORE, Plaintiff, SLYVIA GONZALEZ, prays for the entry of judgment against the Defendant, DOLLAR TREE STORES, INC., in an amount in excess of THIRTY THOUSAND AND 00/100TH (\$30,000.00) DOLLARS, plus costs of this suit.

CARY J. WINTROUB & ASSOCIATES

By: 
Alexander Lindberg

I.D. # 44667
CARY J. WINTROUB & ASSOCIATES
Attorneys for Plaintiff
10 South LaSalle Street
Suite 2424
Chicago, Illinois 60603
312/726-1021
al@cjwlaw.com

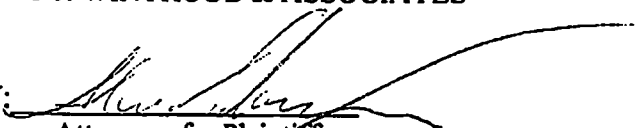
AFFIDAVIT OF DAMAGES

SUPREME COURT RULE 222

The undersigned being first duly sworn upon oath,
deposes and states that he is the attorney for the
plaintiff in the above entitled cause of action seeking
money damages, and states that this cause of action
DOES exceed \$30,000.00.

CARY J. WINTROUB & ASSOCIATES

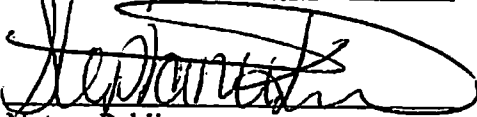
BY:


Attorneys for Plaintiff

Subscribed and Sworn to before me

Date:

11/20/20



Notary Public



I.D. # 44667

CARY J. WINTROUB & ASSOCIATES

Attorneys for Plaintiff

10 South LaSalle Street

Suite 2424

Chicago, Illinois 60603

312/726-1021

al@cjwlaw.com



Notice of Service of Process

JWG / ALL
Transmittal Number: 22431160
Date Processed: 12/15/2020

Primary Contact: Cynthia Bertucci
Dollar Tree, Inc.
500 Volvo Pkwy
Chesapeake, VA 23320-1604

Electronic copy provided to: JJ Jacobson-Allen
Heather Hunter

Entity:	Dollar Tree Stores, Inc. Entity ID Number 3697563
Entity Served:	Dollar Tree Stores, Inc
Title of Action:	Sylvia Gonzalez vs. Dollar Tree Stores, Inc. d/b/a Dollar Tree
Matter Name/ID:	Sylvia Gonzalez vs. Dollar Tree Stores, Inc. d/b/a Dollar Tree (10740751)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Cook County Circuit Court, IL
Case/Reference No:	2020L012661
Jurisdiction Served:	Illinois
Date Served on CSC:	12/15/2020
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Alexander Lindberg 312-726-1021

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To avoid potential delay, please do not send your response to CSC

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Exhibit B



Office of the Secretary of State Jesse White
CYBERDRIVEILLINOIS.COM

Corporation/LLC Search/Certificate of Good Standing

Corporation File Detail Report

File Number	58239232
Entity Name	DOLLAR TREE STORES, INC.
Status	ACTIVE

Entity Information
Entity Type CORPORATION
Type of Corp FOREIGN BCA
Qualification Date (Foreign) Monday, 13 March 1995
State VIRGINIA

Exhibit C

Duration Date
PERPETUAL

Agent Information

Name
ILLINOIS CORPORATION SERVICE C

Address
801 ADLAI STEVENSON DRIVE
SPRINGFIELD , IL 62703

Change Date
Tuesday, 13 June 2017

Annual Report

Filing Date
Monday, 22 June 2020

For Year
2020

Officers

President
Name & Address
MIKE WITYNSKI 500 VOLVO PARKWAY CHESAPEAKE VA 23320

Secretary
Name & Address
WILLIAM A OLD JR. SAME

Assumed Name
INACTIVE DOLLAR BILL\$
INACTIVE DEAL\$

[Return to Search](#)

[File Annual Report](#)

[Adopting Assumed Name](#)

[Change of Registered Agent and/or Registered Office](#)

(One Certificate per Transaction)

Entity Information

Entity Information

Entity Name: DOLLAR TREE STORES, INC.
Entity ID: 02938496
Entity Type: Stock Corporation
Entity Status: **Active**
Formation Date: 10/15/1986
Reason for Status: Active and In Good Standing
VA Qualification Date: 10/15/1986
Status Date: 12/01/2004
Industry Code: 0 - General
Period of Duration: Perpetual
Jurisdiction: VA
Annual Report Due Date: N/A
Registration Fee Due Date: Not Required
Charter Fee: \$0.00

Registered Agent Information

RA Type: Entity

Locality: RICHMOND CITY

Exhibit D

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(https://www.facebook.com/VirginiaStateCorporationCommission) BUSINESS E: IT (https://twitter.com/VASCCorpComm) BUSINESS IN VIRGINIA

Name: CORPORATION SERVICE COMPANY

Registered Office Address: 100 Shockoe Slip Fl 2, Richmond, VA, 23219 - 4100, USA

Principal Office Address

Address: 500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA

Principal Information

Title	Director	Name	Address	Last Updated
Assistant Secretary	No	CYNTHIA BERTUCCI	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	DEBORAH MILLER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Chief Executive Officer	Yes	KEVIN S. WAMPLER	500 VOLVO PARKWAY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
President, Chief Executive Officer	Yes	MICHAEL WITYNSKI	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President, Treasurer, Assistant Secretary	No	ROGER DEAN	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Deputy General Counsel	No	BETH BERMAN	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020

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Title	Director	Name	Address		
Chief Human Resources Officer	No	BETTY CLICK	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Chair	No	BOB SASSER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Zone Vice President	No	BRIAN PRETTYMAN	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Vice President	No	BRUCE PAOLINI	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Chief Development Officer	No	BRUCE WALTERS	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Vice President	No	CHRISTOPHER TEETER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Senior Vice President	No	CHRISTOPHER WILLIAMS	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Assistant Secretary	No	CLINTON J. YORK	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Chief Strategy Officer	No	DAVID JACOBS	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Vice President	No	DAVID JEWELL	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020
Zone Vice President	No	DAWN MARTINEZ	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA		09/29/2020

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Title	Director	Name	Address	
Zone Vice President	No	DOUGLAS YOST	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	JONATHAN L. ELDER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Chief Information Officer	No	JOSHUA R. JEWETT	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Senior Vice President, Controller and Assistant Secretary	No	KATHLEEN MALLAS	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Deputy General Counsel	No	KAY STOCKWELL	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	KEITH ZANNI	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	LEONEL ANGUIANO	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	MICHEAL HENDRICKS	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	MIKE PROFFIT	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Senior Vice President	No	PATRICK MULLARKEY	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Zone Vice President	No	PETER BARNETT	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020

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Title	Director	Name	Address	
Vice President	No	RANDY GUILER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Chief Merchandising Officer	No	RICHARD MCNEELY	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	ROBERT GANTT	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Senior Vice President	No	ROBERT OBEROSLER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	ROBERT THOMSON	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Zone Vice President	No	RUSS HARDEN	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	RYAN HILL	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	SCOTT KERN	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Assistant Secretary	No	SHAWNTA TOTTEN-MEDLEY	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Senior Vice President	No	STEVE FARRELL	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Vice President	No	STEVEN SCHUMACHER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020

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Title	Director	Name	Address	
Vice President	No	SUZAN KAUFMAN	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Senior Vice President	No	THOMAS MCALOON	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Senior Vice President	No	TODD LITTLER	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Chief Operating Officer	No	TOM O'BOYLE	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Zone Vice President	No	VIRGINIA CHASE	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020
Chief Legal Officer, General Counsel and Corporate Secretary	No	WILLIAM A. OLD. JR.	500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/29/2020

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